

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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**Allan Chiocca,**

**Plaintiff**

v.

**Civ. A. No.: 1:19-cv-10482-WGY**

**The Town of Rockland, Deirdre Hall,  
Edward Kimball, Larry Ryan,  
Michael Mullen Jr., Michael O'Loughlin,  
Richard Penney, and Kara Nyman**

**Defendants**

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**COUNTERCLAIM PLAINTIFFS DEIRDRE HALL AND EDWARD KIMBALL'S  
ASSENTED-TO MOTION TO FILE EXHIBITS AND VARIOUS PORTIONS  
OF THEIR OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY  
JUDGMENT ON THEIR COUNTERCLAIMS UNDER SEAL**

With the Parties' assent, and pursuant to Local Rules 7.1 and 7.2, Defendants and Counterclaim Plaintiffs Deirdre Hall and Edward Kimball (together, "Counterclaim Plaintiffs") move to seal certain exhibits and related portions of their Opposition to Plaintiff's Motion for Summary Judgment on their Counterclaims ("Opposition") [Dkt. No. 178]. These exhibits and relevant portions of the Opposition are confidential and the sealing of these materials is consistent with the recent motions to seal ordered by this Court. The Court has also entered a Stipulation and Protective Order in this matter. [Dkt. No. 96]. Finally, all materials should remain sealed until further Order by the Court.

WHEREFORE, the Counterclaim Plaintiffs respectfully request the Court allow this Motion.

Respectfully submitted,

EDWARD KIMBALL,  
By his attorneys,  
TODD & WELD, LLP,

*/s/ Howard M. Cooper*  
Howard M. Cooper, BBO #543842  
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DEIRDRE HALL,  
By her attorney,  
BURNS & LEVINSON,

*/s/ Ellen J. Zucker*  
Ellen J. Zucker, BBO #568051  
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nsharma@burnslev.com

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

I, Neerja Sharma, hereby certify that I conferred, on behalf of the Counterclaim Plaintiffs, with counsel and all parties assent to this Motion.

*/s/ Neerja Sharma*  
Neerja Sharma

**CERTIFICATE OF SERVICE**

I, Neerja Sharma, do hereby certify that this document filed through the ECF system shall be sent electronically to the registered participants as identified on the Notice of Electronic Filing on December 20, 2021.

*/s/ Neerja Sharma*  
Neerja Sharma